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March 31, 2025

VIA ECF

The Honorable Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1910
New York, NY 10007

Re: *American Federation of Government Employees, AFL-CIO, et al v. U.S. Office of Personnel Management, et al.*, 25-cv-1237-DLC

Dear Judge Cote:

We represent Plaintiffs in the above-referenced matter. We write respectfully to request that the Court order the parties to meet and confer and submit a proposed briefing schedule for Plaintiffs' motion for a preliminary injunction. We have reviewed the administrative record produced by Defendants, which we understand is the same administrative record on which the district court in *American Federation of Teachers v. Bessent* issued a preliminary injunction last week against, *inter alia*, Defendant Office of Personnel Management. No. 25-cv-0430-DLB (D. Md.), ECF No. 68 (March 24, 2025). Plaintiffs believe that the administrative record in this case warrants the same result and thus are prepared to move forward with their motion for preliminary injunction with all due haste, rather than renewing their motion for expedited discovery at this time.

Plaintiffs notified Defendants by email last Thursday, March 27 that they would like to move forward with briefing their motion for preliminary injunction. Defendants have not responded to that email.

Respectfully,

/s/ Rhett O. Millsaps II

Counsel for Plaintiffs